

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

JOHNNY M. HUNT, )  
                        )  
Plaintiff,           )  
                        )  
vs.                   )      Case No. 3:23-cv-00243  
                        )  
SOUTHERN BAPTIST CONVENTION; )      Judge Richardson  
GUIDEPOST SOLUTIONS LLC; and )      Magistrate Judge Frenzley  
EXECUTIVE COMMITTEE OF THE )      Jury Demand  
SOUTHERN BAPTIST CONVENTION, )  
                        )  
Defendants.          )

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**CONSOLIDATED REPLY IN SUPPORT OF MOTION TO COMPEL AND RESPONSE  
TO MOTION FOR A PROTECTIVE ORDER AND IN CAMERA REVIEW**

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Pursuant to Rule 7.01 of the Local Rules of Court, Plaintiff Johnny M. Hunt, by and through the undersigned counsel, hereby respectfully submits his Consolidated Reply in Support of his Motion to Compel (ECF Doc. No. 57) and his Response in Opposition to the Motion for a Protective Order and *In Camera* Review (ECF Doc. No. 61) filed by Defendant Guidepost Solutions LLC (“Guidepost”).

As explained more fully in the accompanying Consolidated Memorandum in Support of his Reply in Support of Motion to Compel and Response in Opposition to Guidepost’s Motion for a Protective Order and *In Camera* Review, Plaintiff’s Motion to Compel should be granted in its entirety, and Guidepost’s Motion for a Protective Order and *In Camera* Review should be denied in its entirety. Guidepost has admitted to the responsiveness of the documents it is withholding from production to Plaintiff’s discovery requests; Guidepost’s belated objection to producing documents on the basis of its contractual commitment to the SBC is without merit and

has been waived; Guidepost previously committed to producing the documents it is now withholding from production; the documents Guidepost is withholding are key evidence in the case, particularly in light of the representations made by Guidepost in its Motion for a Protective Order and *In Camera* Review (and the filings related thereto); and, in any event, Guidepost has failed to carry its burden under Rule 26(c) of the Federal Rules of Civil Procedure to justify relief from its discovery obligations in this case. For these reasons, Plaintiff should also be awarded his reasonable expenses, including attorney's fees, incurred in making his Motion to Compel and responding to the Motion for a Protective Order and *In Camera* Review.

For the foregoing reasons, as well as the reasons set forth in the accompanying Consolidated Memorandum, this Court should grant the Motion to Compel (ECF Doc. No. 57) in its entirety and deny the Motion for a Protective Order and *In Camera* Review (ECF Doc. No. 61) in its entirety.

Dated: October 27, 2023

Respectfully submitted,

s/ Andrew Goldstein

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Consolidated Reply in Support of Motion to Compel and Response to Motion for a Protective Order and *In Camera* Review has been served on October 27, 2023, using the CM/ECF system, which will automatically serve all counsel of record listed below:

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